

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

THE THOMPSON FILM, LLC,

Plaintiff,

v.

NO. 2:13-CV-560-RSL

DEFENDANT STANLEY'S
ANSWER AND AFFIRMATIVE
DEFENSES TO PLAINTIFF'S
COMPLAINT

KIMBERLY BANKS, an individual;
MICHAEL PETERSON, an individual;
JIM WHIGHAM, an individual;
ERIC MORRIS, an individual;
MARY LOGEL, an individual;
MONIKA MITCHELL, an individual;
BARBARA STANLEY, an individual;
JOAQUIN CONCEPCION, an individual;
GINO WALL, an individual;
LEROY SUNDE, an individual;
CRYSTAL EWING, an individual;
KYLE BAXTER, an individual;
MAUREEN GRAZIANO, an individual;
TRACY CLACK, an individual;
DOAN'NHI NGUYEN, an individual;
ELDRA HARDENBROOK, an individual;
DONALD HELGESON, an individual;
DOES 1-6; DOES 8-15; DOES 17-19;
DOES 21-26; DOES 28; DOES 30-46;
DOES 48-69; DOES 71-89; DOES 91-92;
DOES 94-100; DOES 102-103; DOES

105-107; DOES 109-112; DOES 114-151;
DOES 153-164; DOES 166-167; DOES
169-170; and DOES 172-194

Defendants.

Defendant, Barbara Stanley (“Stanley”), in answer to Plaintiff’s Complaint, admits, denies and alleges as follows:

INTRODUCTION

1. In answer to Paragraph 1, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 and, therefore, denies the same.
2. In answer to Paragraph 2, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 and, therefore, denies the same.
3. Paragraph 3 states argument and contentions of law and, therefore, requires no answer. Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 and, therefore, denies the same.
4. In answer to Paragraph 4, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 and, therefore, denies the same.
5. In answer to Paragraph 5, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 and, therefore, denies the same.
6. In answer to Paragraph 6, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 and, therefore, denies the same.

- 1 7. In answer to Paragraph 7, Stanley lacks knowledge or information sufficient to form a
2 belief as to the truth of the allegations contained in Paragraph 7 and, therefore, denies
3 the same.
- 4 8. In answer to Paragraph 8, Stanley lacks knowledge or information sufficient to form a
5 belief as to the truth of the allegations contained in Paragraph 8 and, therefore, denies
6 the same.
- 7 9. Stanley denies the allegations of Paragraph 9.
- 8 10. Paragraph 10 states argument and contentions of law and, therefore, requires no answer.
9 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
10 form a belief as to the truth of the allegations contained in Paragraph 10 and, therefore,
11 denies the same.
- 12 11. In answer to Paragraph 11, Stanley lacks knowledge or information sufficient to form a
13 belief as to the truth of the allegations contained in Paragraph 11 and, therefore, denies
14 the same.
- 15 12. Paragraph 12 states argument and contentions of law and, therefore, requires no answer.
16 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
17 form a belief as to the truth of the allegations contained in Paragraph 12 and, therefore,
18 denies the same.
- 19 13. With regards to her participation, either directly or indirectly, Stanley denies the
20 allegations in Paragraph 13. Furthermore, Stanley lacks knowledge or information
21 sufficient to form a belief as to the truth of the allegations contained in Paragraph 13
22 regarding each of the Defendants and, therefore, denies the same.

23 **JURISDICTION AND VENUE**

- 24 14. Paragraph 14 states argument and contentions of law and, therefore, requires no answer.
25 15. Paragraph 15 states argument and contentions of law and, therefore, requires no answer.
26

1 16. Paragraph 16 states argument and contentions of law and, therefore, requires no answer.

2 **PARTIES**

3 **THE PLAINTIFF**

4 17. Stanley is without information necessary to admit or deny the allegations in Paragraph
5 17 and, therefore, denies the same.

6 **The Rights of Plaintiff**

7 18. Stanley is without information necessary to admit or deny the allegations in Paragraph
8 18 and, therefore, denies the same.

9 19. Paragraph 19 states argument and contentions of law and, therefore, requires no answer.
10 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
11 form a belief as to the truth of the allegations contained in Paragraph 19 and, therefore,
12 denies the same.

13 20. Stanley admits that *The Thompsons* is available for sale in commerce.

14 21. Paragraph 21 states argument and contentions of law and, therefore, requires no answer.
15 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
16 form a belief as to the truth of the allegations contained in Paragraph 21 and, therefore,
17 denies the same.

18 22. Paragraph 22 states argument and contentions of law and, therefore, requires no answer.
19 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
20 form a belief as to the truth of the allegations contained in Paragraph 22 and, therefore,
21 denies the same.

22 23. Stanley is without information necessary to admit or deny the allegations in Paragraph
23 23 and, therefore, denies the same.

24 24. Paragraph 24 states argument and contentions of law and, therefore, requires no answer.
25 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
26

1 form a belief as to the truth of the allegations contained in Paragraph 24 and, therefore,
2 denies the same.

3 THE DEFENDANTS

4 In General

5 25. With regards to her role in connection with the use of BitTorrent, Stanley denies the
6 allegations in Paragraph 25. Furthermore, Stanley lacks knowledge or information
7 sufficient to form a belief as to the truth of the allegations contained in Paragraph 25
8 regarding some or all of the Defendants and, therefore, denies the same.

9 26. Stanley denies the allegations contained in Paragraph 26. Furthermore, Stanley lacks
10 knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 26 for each of the Defendants and, therefore, denies the same.

12 27. Stanley is without information necessary to admit or deny the allegations in Paragraph
13 27 and, therefore, denies the same.

14 28. Stanley is without information necessary to admit or deny the allegations in Paragraph
15 28 and, therefore, denies the same.

16 29. Stanley is without information necessary to admit or deny the allegations in Paragraph
17 29 regarding BitTorrent protocol and, therefore, denies the same. Additionally, Stanley
18 was never provided with a copy of Exhibit 1 to Plaintiff's initial Complaint and,
19 therefore, denies the same.

20 Identification of the Named Defendants

21 30. Stanley is without information necessary to admit or deny the allegations in Paragraph
22 30 and, therefore, denies the same.

23 31. Stanley is without information necessary to admit or deny the allegations in Paragraph
24 31 and, therefore, denies the same.

1 32. Stanley is without information necessary to admit or deny the allegations in Paragraph
2 32 and, therefore, denies the same.

3 33. Stanley is without information necessary to admit or deny the allegations in Paragraph
4 33 and, therefore, denies the same.

5 34. Stanley is without information necessary to admit or deny the allegations in Paragraph
6 34 and, therefore, denies the same.

7 35. Stanley is without information necessary to admit or deny the allegations in Paragraph
8 35 and, therefore, denies the same.

9 36. Stanley is without information necessary to admit or deny the allegations in Paragraph
10 36 and, therefore, denies the same.

11 37. Stanley is without information necessary to admit or deny the allegations in Paragraph
12 37 and, therefore, denies the same.

13 38. Stanley is without information necessary to admit or deny the allegations in Paragraph
14 38 and, therefore, denies the same.

15 39. Stanley is without information necessary to admit or deny the allegations in Paragraph
16 39 and, therefore, denies the same.

17 40. Stanley is without information necessary to admit or deny the allegations in Paragraph
18 40 and, therefore, denies the same.

19 41. Stanley is without information necessary to admit or deny the allegations in Paragraph
20 41 and, therefore, denies the same.

21 42. Stanley is without information necessary to admit or deny the allegations in Paragraph
22 42 and, therefore, denies the same.

23 43. Stanley is without information necessary to admit or deny the allegations in Paragraph
24 43 and, therefore, denies the same.
25
26

1 44. Stanley is without information necessary to admit or deny the allegations in Paragraph
2 44 and, therefore, denies the same.

3 45. Stanley is without information necessary to admit or deny the allegations in Paragraph
4 45 and, therefore, denies the same.

5 46. Stanley is without information necessary to admit or deny the allegations in Paragraph
6 46 and, therefore, denies the same.

7 47. Stanley is without information necessary to admit or deny the allegations in Paragraph
8 47 and, therefore, denies the same.

9 48. Stanley admits that Comcast provides internet service, but is without information
10 necessary to admit or deny the remaining allegations in Paragraph 48 and, therefore,
11 denies the same.

12 49. Stanley admits at all times material she resided in Yelm, Washington.

13 50. Stanley denies the allegations contained in Paragraph 50.

14 51. Stanley is without information necessary to admit or deny the allegations in Paragraph
15 51 and, therefore, denies the same.

16 52. Stanley is without information necessary to admit or deny the allegations in Paragraph
17 52 and, therefore, denies the same.

18 53. Stanley is without information necessary to admit or deny the allegations in Paragraph
19 53 and, therefore, denies the same.

20 54. Stanley is without information necessary to admit or deny the allegations in Paragraph
21 54 and, therefore, denies the same.

22 55. Stanley is without information necessary to admit or deny the allegations in Paragraph
23 55 and, therefore, denies the same.

24 56. Stanley is without information necessary to admit or deny the allegations in Paragraph
25 56 and, therefore, denies the same.
26

1 57. Stanley is without information necessary to admit or deny the allegations in Paragraph
2 57 and, therefore, denies the same.

3 58. Stanley is without information necessary to admit or deny the allegations in Paragraph
4 58 and, therefore, denies the same.

5 59. Stanley is without information necessary to admit or deny the allegations in Paragraph
6 59 and, therefore, denies the same.

7 60. Stanley is without information necessary to admit or deny the allegations in Paragraph
8 60 and, therefore, denies the same.

9 61. Stanley is without information necessary to admit or deny the allegations in Paragraph
10 61 and, therefore, denies the same.

11 62. Stanley is without information necessary to admit or deny the allegations in Paragraph
12 62 and, therefore, denies the same.

13 63. Stanley is without information necessary to admit or deny the allegations in Paragraph
14 63 and, therefore, denies the same.

15 64. Stanley is without information necessary to admit or deny the allegations in Paragraph
16 64 and, therefore, denies the same.

17 65. Stanley is without information necessary to admit or deny the allegations in Paragraph
18 65 and, therefore, denies the same.

19 66. Stanley is without information necessary to admit or deny the allegations in Paragraph
20 66 and, therefore, denies the same.

21 67. Stanley is without information necessary to admit or deny the allegations in Paragraph
22 67 and, therefore, denies the same.

23 68. Stanley is without information necessary to admit or deny the allegations in Paragraph
24 68 and, therefore, denies the same.
25
26

1 69. Stanley is without information necessary to admit or deny the allegations in Paragraph
2 69 and, therefore, denies the same.

3 70. Stanley is without information necessary to admit or deny the allegations in Paragraph
4 70 and, therefore, denies the same.

5 71. Stanley is without information necessary to admit or deny the allegations in Paragraph
6 71 and, therefore, denies the same.

7 72. Stanley is without information necessary to admit or deny the allegations in Paragraph
8 72 and, therefore, denies the same.

9 73. Stanley is without information necessary to admit or deny the allegations in Paragraph
10 73 and, therefore, denies the same.

11 74. Stanley is without information necessary to admit or deny the allegations in Paragraph
12 74 and, therefore, denies the same.

13 75. Stanley is without information necessary to admit or deny the allegations in Paragraph
14 75 and, therefore, denies the same.

15 76. Stanley is without information necessary to admit or deny the allegations in Paragraph
16 76 and, therefore, denies the same.

17 77. Stanley is without information necessary to admit or deny the allegations in Paragraph
18 77 and, therefore, denies the same.

19 78. Stanley is without information necessary to admit or deny the allegations in Paragraph
20 78 and, therefore, denies the same.

21 79. Stanley is without information necessary to admit or deny the allegations in Paragraph
22 79 and, therefore, denies the same.

23 80. Stanley is without information necessary to admit or deny the allegations in Paragraph
24 80 and, therefore, denies the same.

25 **Further Identification of the Remaining Doe Defendants**
26

1 81. Stanley admits Plaintiff has not named in the Amended Complaint the persons identified
 2 as Does 1-6, Does 8-15, Does 17-19, Does 21-26, Doe 28, Does 30-46, Does 48-69,
 3 Does 71-89, Does 91-92, Does 94-100, Does 102-103, Does 105-107, Does 109-112,
 4 Does 114-151, Does 153-164, Does 166-167, Does 169-170, and Does 172-194.
 5 Stanley is without information necessary to admit or deny the remaining allegations
 6 contained in Paragraph 81 and, therefore, denies the same.

7 **JOINDER**

8 82. Paragraph 82 states argument and contentions of law and, therefore, requires no answer.
 9 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
 10 form a belief as to the truth of the allegations contained in Paragraph 82 and, therefore,
 11 denies the same.

12 83. Stanley denies that she has collectively acted with all of the Defendants. Furthermore,
 13 Stanley lacks knowledge or information sufficient to form a belief as to the truth of the
 14 allegations contained in Paragraph 83 regarding all of the Defendants and, therefore,
 15 denies the same.

16 84. In answer to Paragraph 84, Stanley lacks knowledge or information sufficient to form a
 17 belief as to the truth of the allegations contained in Paragraph 84 and, therefore, denies
 18 the same.

19 85. Paragraph 85 states argument and contentions of law and, therefore, requires no answer.
 20 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
 21 form a belief as to the truth of the allegations contained in Paragraph 85 and, therefore,
 22 denies the same.

23 86. Paragraph 86 states argument and contentions of law and, therefore, requires no answer.
 24 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
 25
 26

1 form a belief as to the truth of the allegations contained in Paragraph 86 and, therefore,
2 denies the same.

3 87. Paragraph 87 states argument and contentions of law and, therefore, requires no answer.

4 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
5 form a belief as to the truth of the allegations contained in Paragraph 87 and, therefore,
6 denies the same.

7 **FACTS COMMON TO ALL CLAIMS**

8 **IP Addresses**

9 88. Stanley admits that she obtained an account for service in order to connect to the
10 Internet. Stanley lacks knowledge or information sufficient to form a belief as to the
11 truth of the remaining allegations contained in Paragraph 88 and, therefore, denies the
12 same.

13 89. Stanley admits an IP address is assigned to each account holder. Stanley lacks
14 knowledge or information sufficient to form a belief as to the truth of the remaining
15 allegations contained in Paragraph 89 and, therefore, denies the same.

16 90. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations contained in Paragraph 90 and, therefore, denies the same.

18 91. Paragraph 91 states argument and contentions of law and, therefore, requires no answer.
19 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
20 form a belief as to the truth of the allegations contained in Paragraph 91 and, therefore,
21 denies the same.

22 92. Paragraph 92 states argument and contentions of law and, therefore, requires no answer.
23 Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to
24 form a belief as to the truth of the allegations contained in Paragraph 92 and, therefore,
25 denies the same.
26

Peer-to-Peer Internet Piracy Via BitTorrent

93. Paragraph 93 states argument and contentions of law and, therefore, requires no answer.

Notwithstanding the foregoing, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93 and, therefore, denies the same.

94. Stanley denies using, either directly or indirectly, an interactive peer-to-peer file transfer technology. Furthermore, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94 regarding each of the Defendants and, therefore, denies the same.

95. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 95 and, therefore, denies the same.

96. Stanley admits that BitTorrent has been named as the particular peer-to-peer protocol at issue in this Amended Complaint.

97. With regards to herself, Stanley denies the allegations contained in Paragraph 97. Furthermore, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 97 regarding each of the Defendants and, therefore, denies the same.

98. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 98 and, therefore, denies the same.

99. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 99 and, therefore, denies the same.

100. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 100 and, therefore, denies the same.

101. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 101 and, therefore, denies the same.

1 102. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
2 the allegations contained in Paragraph 102 and, therefore, denies the same.

3 103. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
4 the allegations contained in Paragraph 103 and, therefore, denies the same.

5 104. Stanley denies the allegations in Paragraph 104. Furthermore, Stanley lacks
6 knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 104 regarding some or all of the Defendants' participation, and
8 therefore, denies the same.

9 105. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
10 the allegations contained in Paragraph 105 and, therefore, denies the same.

11 106. Stanley lacks knowledge or information sufficient to form a belief as to the truth
12 of the allegations contained in Paragraph 106 and, therefore, denies the same.

13 107. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
14 the allegations contained in Paragraph 107 and, therefore, denies the same.

15 108. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
16 the allegations contained in Paragraph 108 and, therefore, denies the same.

17 109. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
18 the allegations contained in Paragraph 109 and, therefore, denies the same.

19 110. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
20 the allegations contained in Paragraph 110 and, therefore, denies the same.

21 111. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
22 the allegations contained in Paragraphs 111 and, therefore, denies the same.

23 112. Stanley lacks knowledge or information sufficient to form a belief as to the truth
24 of the allegations contained in Paragraphs 112 and, therefore, denies the same.
25
26

1 113. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
2 the allegations contained in Paragraphs 113 and, therefore, denies the same.

3 114. Stanley denies distribution of unlawful copy of a motion picture. Furthermore,
4 Stanley lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations contained in Paragraph 114 regarding other Defendants and, therefore,
6 denies the same.

7 115. Stanley denies, either directly or indirectly, participation in a swarm. Additionally,
8 Stanley lacks knowledge or information sufficient to form a belief as to the truth of the
9 allegations contained in Paragraph 115 regarding each of the Defendants and, therefore,
10 denies the same.

11 **Conduct of Defendants**

12 116. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
13 the allegations contained in Paragraph 116 regarding each of the Defendants and,
14 therefore, denies the same.

15 117. Paragraph 117 states argument and contentions of law and, therefore, requires no
16 answer. Notwithstanding the foregoing, Stanley lacks knowledge or information
17 sufficient to form a belief as to the truth of the allegations contained in Paragraph 117
18 and, therefore, denies the same.

19 118. Stanley lacks knowledge or information sufficient to form a belief as to the truth of
20 what the Plaintiff observed and, therefore, denies the allegations contained in Paragraph
21 118. Furthermore, Stanley lacks knowledge of what each Defendant knew or should
22 have known and, therefore, denies the same.

23 119. Stanley denies either directly or indirectly being involved in a swarm and,
24 therefore, denies the allegations contained in Paragraph 119. Furthermore, Stanley lacks
25 knowledge or information sufficient to form a belief as to the truth of the allegations
26

1 contained in Paragraph 119 regarding the numerous Defendants and, therefore, denies
2 the same.

3 120. Stanley denies the allegations in Paragraph 120. Furthermore, Stanley lacks
4 knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained in Paragraph 120 regarding each Defendant and, therefore, denies the same.

6 121. Stanley denies the allegations in Paragraph 121. Furthermore, Stanley lacks
7 knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained in Paragraph 121 regarding each Defendant and, therefore, denies the same.

9 122. Stanley denies the allegations in Paragraph 122. Furthermore, Stanley lacks
10 knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 122 regarding other Defendants and, therefore, denies the same.

12 123. Stanley denies the allegations in Paragraph 123. Furthermore, Stanley lacks
13 knowledge or information sufficient to form a belief as to the truth of the allegations
14 contained in Paragraph 123 regarding the many Defendants and, therefore, denies the
15 same.

16 124. Stanley denies the allegations in Paragraph 124. Furthermore, Stanley lacks
17 knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 124 regarding the many Defendants and, therefore, denies the
19 same.

20 125. Stanley denies the allegations in Paragraph 125. Furthermore, Stanley lacks
21 knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained in Paragraph 125 regarding the each Defendant and, therefore, denies the
23 same.

24 **Exemplar Defendant**

126. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 126 and, therefore, denies the same.

127. Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 127 and, therefore, denies the same.

128. Stanley denies the allegations contained in Paragraph 128. Additionally, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 128 regarding each Defendant and, therefore, denies the same.

CLAIMS FOR RELIEF AND STATED IN THE ALTERNATIVE

FIRST CLAIM FOR RELIEF

COPYRIGHT INFRINGEMENT

129. Stanley answers as she answered in the incorporated paragraphs.

130. Stanley denies the allegations contained in Paragraph 130. Additionally, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 130 regarding each Defendant and, therefore, denies the same.

131. Stanley denies the allegations contained in Paragraph 131. Additionally, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 131 regarding each Defendant and, therefore, denies the same.

132. Stanley denies the allegations contained in Paragraph 132. Additionally, Stanley lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 132 regarding each Defendant and, therefore, denies the same.

1 133. Stanley denies the allegations contained in Paragraph 133. Additionally, Stanley
2 lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations contained in Paragraph 133 regarding each Defendant and, therefore, denies
4 the same.

5 134. Stanley denies the allegations contained in Paragraph 134. Additionally, Stanley
6 lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations contained in Paragraph 134 regarding each Defendant and, therefore, denies
8 the same.

9 135. Stanley denies the allegations contained in Paragraph 135.

10 136. Stanley denies the allegations contained in Paragraph 136. Additionally, Stanley
11 lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations contained in Paragraph 136 regarding each Defendant and, therefore, denies
13 the same.

14 137. Stanley denies the allegations contained in Paragraph 137. Additionally, Stanley
15 lacks knowledge or information sufficient to form a belief as to the truth of the
16 allegations contained in Paragraph 137 regarding each Defendant and, therefore, denies
17 the same.

18 **SECOND CLAIM FOR RELIEF**

19 **CONTRIBUTORY INFRINGEMENT**

20 138. Stanley answers as she answered in the incorporated paragraphs.

21 139. Stanley denies the allegations contained in Paragraph 139. Additionally, Stanley
22 lacks knowledge or information sufficient to form a belief as to the truth of the
23 allegations contained in Paragraph 139 regarding each Defendant and, therefore, denies
24 the same.
25
26

1 140. Stanley denies the allegations contained in Paragraph 140. Additionally, Stanley
2 lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations contained in Paragraph 140 regarding each Defendant and, therefore, denies
4 the same.

5 141. Stanley denies the allegations contained in Paragraph 141. Additionally, Stanley
6 lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations contained in Paragraph 141 regarding each Defendant and, therefore, denies
8 the same.

9 142. Stanley denies the allegations contained in Paragraph 142. Additionally, Stanley
10 lacks knowledge or information sufficient to form a belief as to the truth of the
11 allegations contained in Paragraph 142 regarding each Defendant and, therefore, denies
12 the same.

13 143. Stanley denies the allegations contained in Paragraph 143.

14 144. Stanley denies the allegations contained in Paragraph 144. Additionally, Stanley
15 lacks knowledge or information sufficient to form a belief as to the truth of the
16 allegations contained in Paragraph 144 regarding each Defendant and, therefore, denies
17 the same.

18 145. Stanley denies the allegations contained in Paragraph 145. Additionally, Stanley
19 lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations contained in Paragraph 145 regarding each Defendant and, therefore, denies
21 the same.

22 **THIRD CLAIM FOR RELIEF**

23 **Alternative Statement Pursuant to FRCP 8(d)(2)**

24 **Indirect Infringement of Copyright**

25 146. Stanley answers as she answered in the incorporated paragraphs.
26

1 147. Stanley admits that she obtained internet access through an ISP and denies the
2 remaining allegations in Paragraph 147. Additionally, Stanley lacks knowledge or
3 information sufficient to form a belief as to the truth of the allegations contained in
4 Paragraph 147 regarding each Defendant and, therefore, denies the same.

5 148. Stanley denies the allegations contained in Paragraph 148. Additionally, Stanley
6 lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations contained in Paragraph 148 regarding each Defendant and, therefore, denies
8 the same.

9 149. Stanley denies the allegations contained in Paragraph 149. Additionally, Stanley
10 lacks knowledge or information sufficient to form a belief as to the truth of the
11 allegations contained in Paragraph 149 regarding each Defendant and, therefore, denies
12 the same.

13 150. Stanley denies the allegations contained in Paragraph 150. Additionally, Stanley
14 lacks knowledge or information sufficient to form a belief as to the truth of the
15 allegations contained in Paragraph 150 regarding each Defendant and, therefore, denies
16 the same.

17 151. Stanley denies the allegations contained in Paragraph 151. Additionally, Stanley
18 lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations contained in Paragraph 151 regarding each Defendant and, therefore, denies
20 the same.

21 152. Stanley denies the allegations contained in Paragraph 152. Additionally, Stanley
22 lacks knowledge or information sufficient to form a belief as to the truth of the
23 allegations contained in Paragraph 152 regarding each Defendant and, therefore, denies
24 the same.

25 153. Stanley denies the allegations contained in Paragraph 153.
26

1 154. Stanley denies the allegations contained in Paragraph 154. Additionally, Stanley
 2 lacks knowledge or information sufficient to form a belief as to the truth of the
 3 allegations contained in Paragraph 154 regarding each Defendant and, therefore, denies
 4 the same.

5 155. Stanley denies the allegations contained in Paragraph 155. Additionally, Stanley
 6 lacks knowledge or information sufficient to form a belief as to the truth of the
 7 allegations contained in Paragraph 155 regarding each Defendant and, therefore, denies
 8 the same.

9 **DAMAGES**

10 156. Paragraph 156 states argument and contentions of law and, therefore, requires no
 11 answer. Notwithstanding the foregoing, Stanley lacks knowledge or information
 12 sufficient to form a belief as to the truth of the allegations contained in Paragraph 156
 13 and, therefore, denies the same.

14 **Notice of Further Claims**

15 157. Paragraph 157 states argument and contentions of law and, therefore, requires no
 16 answer. Notwithstanding the foregoing, Stanley lacks knowledge or information
 17 sufficient to form a belief as to the truth of the allegations contained in Paragraph 157
 18 and, therefore, denies the same.

19 158. Paragraph 158 states argument and contentions of law and, therefore, requires no
 20 answer. Notwithstanding the foregoing, Stanley lacks knowledge or information
 21 sufficient to form a belief as to the truth of the allegations contained in Paragraph 158
 22 and, therefore, denies the same.

23 159. Paragraph 159 does not state allegations of fact directed towards Stanley and to
 24 which Stanley can or should respond. Stanley lacks knowledge or information
 25 sufficient to answer the allegations herein and, therefore, denies the same.
 26

PRAYER FOR RELIEF

Stanley denies that Plaintiff is entitled to the relief requested from Stanley in Paragraphs (A) – (C).

By Way of FURTHER ANSWER and AFFIRMATIVE DEFENSES, Stanley alleges:

1. The Amended Complaint, and each and every purported cause of action contained therein, fails to state facts sufficient to constitute a cause of action against Stanley.
2. Plaintiff is equitably barred from recovery by the doctrine of unclean hands.

DATED this 12th day of November, 2013.

s/ Barbara Stanley
BARBARA STANLEY, PRO SE PLAINTIFF
9405 BRIDGE ROAD SE
YELM, WA 98597
(360) 458-5766

DECLARATION OF SERVICE

I declare that I sent for service, a copy of this document on all parties or their counsel of record on the date below as follows:

☒ US Mail to:
Maureen C. VanderMay
The VanderMay Law Firm PC
2021 S Jones Blvd
Las Vegas, Nevada 89146
(702) 538-9300

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 12th day of November, 2013, at YELM, WA.

s/ Barbara Stanley
BARBARA STANLEY, Pro Se